

EXHIBIT A

Cengage v. Google, 24-cv-4274
March 4, 2025

Exhibit A
Plaintiffs' Proposed Production Schedule

Date	Defendant's Production (Proposed; [Existing])¹	Plaintiffs' Production
March 17, 2025	<ul style="list-style-type: none"> • <i>RFP 2 (departments/personnel)</i> • <i>RFP 6 (policies and implementation re copyright infringement) (non-custodial docs)</i> • <i>RFP 7 (policies and implementation re trademark infringement) (non-custodial docs)</i> • <i>RFP 8 (technology for copyright infringement in Shopping Ads) (non-custodial docs)</i> • <i>RFP 11 (systems for Infringement Notices)</i> • <i>RFP 17 (circumstances in which you would reject a notice)</i> • <i>RFP 18 (duplicate notices)</i> • <i>RFP 21 (scripted responses to infringement notices)</i> 	<ul style="list-style-type: none"> • RFP 34 (examples of use of marks in commerce) • RFP 39 (chain of title for trademarks)
March 31, 2025	<ul style="list-style-type: none"> • <i>RFP 9 (reports on copyright infringement by Shopping Ads Merchants) (non-custodial docs)</i> • <i>RFP 12 (policies for Related Ads Merchants)</i> • <i>RFP 14 (impact or effectiveness of copyright infringement policies) (non-custodial docs)</i> • <i>RFP 15 (reports concerning processing of Infringement Notices) (non-custodial docs)</i> • <i>RFP 16 (reports on Infringement Notices) (non-custodial docs)</i> • <i>RFP 19 (reinstated merchants)</i> • [RFP 25 (identifying information) (per Dkt. 76)] • [RFP 27 (infringement notices concerning Domain-Identified Merchant accounts and Email-Connected Merchant accounts) (per Dkt. 76)] 	<ul style="list-style-type: none"> • RFP 2, 5-11, 13 (author agreements, rolling production expected to begin this week) • RFP 23 (financial/valuation documents) • RFP 24 (pricing information for works in suit) • RFP 25 (impact of infringement) • RFP 35-37 (consumer surveys, market research, brand guidelines, brand strategy) • RFP 41 (trademark guidelines) • RFP 1, 9 (digital copies of works in suit)

¹ Proposed deadlines are shown in italics; existing deadlines are shown in brackets. The descriptions of each RFP are included only for ease of review, and should not be interpreted as changing the scope of the RFRP.

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	<ul style="list-style-type: none"> • <i>RFP 28 (notices from any person concerning the Infringing Domains)</i> • <i>RFP 42 (employees involved in Shopping Ads for Infringing Merchants)</i> • [RFP 35 (documents provided by Domain-Identified Merchants) (per Dkt. 76)] • [RFP 36 (bullets 1, 3, 4, 5, 6) (per Dkt. 76)] • [RFP 37 (bullets 1, 2, 3, 7) (per Dkt. 76)] • [RFP 44 (common relationships) (per Dkt. 76)] 	
April 15, 2025	<ul style="list-style-type: none"> • <i>RFP 3 (each notice from a Shopping Ads Merchant and how processed)</i> • <i>RFP 4 (adverse actions against Shopping Ads Merchants for copyright infringement)</i> • <i>RFP 6 (policies and implementation re copyright infringement) (custodial docs)</i> • <i>RFP 7 (policies and implementation re trademark infringement) (custodial docs)</i> • <i>RFP 13 (policies/procedures considered but not adopted) (non-custodial docs)</i> • <i>RFP 23 (policies for sharing infringement notices)</i> • <i>RFP 41 (employees involved in Shopping Ads for Plaintiffs)</i> • <i>RFP 45 (docs concerning Digital Books Shopping Ads Policy) (non-custodial docs)</i> • <i>RFP 46 (procedures for labeling accounts "verified")</i> • <i>RFP 50 (whether/under what circumstances Google would terminate merchants in other platforms based on Shopping Ads notices)</i> 	<ul style="list-style-type: none"> • RFP 16-20, 81-83 (communications concerning DMCA enforcement of Shopping Ads and notice data re Shopping Ads) • RFP 40 (Plaintiffs' communications with Google) • RFP 29, 48, 67 (communications with third parties, subject to Plaintiffs'-Google's ongoing discussions)
May 1, 2025	<ul style="list-style-type: none"> • <i>RFP 8 (technology for copyright infringement in Shopping Ads) (custodial docs)</i> 	<ul style="list-style-type: none"> • Contention RFPs (42-59, 61-67) to the extent not already produced

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	<ul style="list-style-type: none"> • <i>RFP 9 (reports on copyright infringement by Shopping Ads Merchants) (non-custodial docs)</i> • <i>RFP 10 (reports on copyright infringement by pirate websites generally)</i> • <i>RFP 13 (policies/procedures considered but not adopted) (custodial docs)</i> • <i>RFP 22 (communications concerning Plaintiffs' notices)</i> • <i>RFP 52 (AAP correspondence)</i> 	
May 15, 2025	<ul style="list-style-type: none"> • <i>RFP 14 (impact or effectiveness of copyright infringement policies) (custodial docs)</i> • <i>RFP 15 (reports concerning processing of Infringement Notices) (custodial docs)</i> • <i>RFP 16 (reports on Infringement Notices) (custodial docs)</i> • <i>RFP 45 (docs concerning Digital Books Shopping Ads Policy) (custodial docs)</i> • <i>RFP 47 (auction methodology)</i> • <i>RFP 53 (financial performance)</i> • <i>RFP 54 (performance of Shopping Ads)</i> 	
May 30, 2025	<ul style="list-style-type: none"> • <i>RFP 36, bullet 7 (ads run on other platforms)</i> • <i>RFP 39 (info on ads run for Plaintiffs)</i> • <i>RFP 40 (info on ads run for Plaintiffs)</i> • <i>RFP 51 (DMCA Agent)</i> 	
June 3, 2025	<ul style="list-style-type: none"> • <u><i>Substantial completion of document production</i></u> • <i>RFP 1 (status as a legal entity)</i> • <i>RFP 5 (adverse actions against Shopping Ads Merchants for other than copyright infringement)</i> • <i>RFP 26 (Google services used by each Infringing/Related Ads Merchant)</i> • <i>RFP 32 (reports on other illegal activity by Shopping Ads Merchants)</i> 	<ul style="list-style-type: none"> • <u><i>Substantial completion of document production</i></u>

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Date	Defendant's Production (<i>Proposed</i> ; <i>Existing</i>) ¹	Plaintiffs' Production
	<ul style="list-style-type: none"> • <i>RFP 48 (lawsuits against direct infringers)</i> • <i>RFP 55 (affirmative defenses)</i> • <i>RFP 56 (ROGS, RFA)</i> • <i>RFP 57 (subpoenas)</i> • <i>RFP 58 (exhibits)</i> 	
July 1, 2025	<ul style="list-style-type: none"> • <u>Completion of document production</u> • [RFP 27 (services used by the infringing merchants) (per Dkt. 76)] • [RFP 29 (communications with Infringing Merchants) (per Dkt. 76)] • [RFP 31 (red flags for Infringing Merchants) (per Dkt. 76)] • [RFP 33 (revenue) (per Dkt. 76)] • [RFP 34 (revenue) (per Dkt. 76)] • [RFP 36, bullets 2 (per Dkt. 76)] • <i>RFP 30 (clicks, conversions, bidding tools)</i> • <i>RFP 37, bullets 4, 5, 6, 8, 9, 10 (per Dkt. 76)</i> • [RFP 38 (Shopping Ads run, rejected for Domain-Identified Merchant accounts) (per Dkt. 76)] 	<ul style="list-style-type: none"> • <u>Completion of document production</u>
Privilege Logs	<ul style="list-style-type: none"> • <i>For each side, Privilege logs for any production shall be due two weeks after the production is made, with the exception of productions made after June 1, 2025, for which privilege logs shall be produced simultaneously with the production.</i> 	